

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

KAIST IP US LLC,

Plaintiff and Counterclaim-Defendant,

v.

SAMSUNG ELECTRONICS CO., LTD.;  
SAMSUNG ELECTRONICS AMERICA, INC.;  
SAMSUNG SEMICONDUCTOR, INC.;  
SAMSUNG AUSTIN SEMICONDUCTOR, LLC;  
GLOBALFOUNDRIES INC.;  
GLOBALFOUNDRIES U.S. INC.; and  
QUALCOMM INC.,

Defendants and Counterclaim-Plaintiffs.

Case No.: 2:16-cv-01314-JRG-RSP

Honorable Rodney Gilstrap

**GLASER WEIL FINK HOWARD AVCHEN & SHAPIRO LLP'S  
OPPOSITION TO JOINT MOTION AND  
STIPULATION OF DISMISSAL WITH PREJUDICE**

Glaser Weil Fink Howard Avchen & Shapiro LLP (“Glaser Weil”) hereby opposes the parties’ Joint Motion and Stipulation of Dismissal with Prejudice (Dkt. No. 700). The grounds for this opposition are as follows. On August 28, 2020, Glaser Weil moved to enforce its attorney’s charging lien (previously filed at Dkt. No. 535) on the proceeds or consideration paid, including from any and all judgements, settlements, or awards(s), as part of a resolution of the disputes at issue between Plaintiff KIPB LLC, formerly known as KAIST IP US LLC (“KAIST IP US”), and Defendants. (Dkt. No. 699). Based on the Joint Motion to Dismiss, Glaser Weil understands that the parties have reached a resolution, but that Plaintiff KAIST IP US, its former client, does not intend to pay Glaser Weil its earned contingency fee. Therefore, Glaser Weil respectfully asks that the Joint Motion and Stipulation of Dismissal with Prejudice be denied

until the enforcement of Glaser Weil's attorney's charging lien is resolved.

Date: September 4, 2020

Respectfully submitted,

Kurt Truelove

Kurt Truelove  
Texas State Bar 24013653  
Truelove Law Firm  
100 West Houston Street, P.O. Box 1409  
Marshall, Texas, 75671  
(903) 938-8321 [Tel]  
(903) 215-8510 [Fax]

Lawrence M. Hadley  
Cal. Bar No. 157728 (admitted in E.D. Texas)  
GLASER WEIL FINK HOWARD  
AVCHEN & SHAPIRO LLP  
10250 Constellation Blvd., 19th Floor  
Los Angeles, California 90067  
Telephone: (310) 553-3000  
Facsimile: (310) 556-2920  
lhadley@glaserweil.com

*Attorneys for non-party Glaser Weil Fink  
Howard Avchen & Shapiro LLP*

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this notice was served on all counsel who have consented to electronic service, Local Rule CV-5(a)(3)(A), on September 4, 2020.

Kurt Truelove

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